

CP:BSK
F. # 2008R00404/OCDETF #NY-NYE-288

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

MAXIMILIANO BONILLA OROZCO,
also known "Valenciano,"

Defendant.

Cr. No. _____
(T. 21, U.S.C., §§
959(c), 960(a)(3),
960(b)(1)(B)(ii),
963 and 853; T. 18,
U.S.C., §§ 3551 et seq.)

- - - - - X .

THE GRAND JURY CHARGES:

1. On or about and between January 1, 1990 and February 29, 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MAXIMILIANO BONILLA OROZCO, also known as "Valenciano," together with others, did knowingly and intentionally conspire to distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 959(a).

(Title 21, United States Code, Sections 963, 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant charged with the above offense that, upon his conviction of such

offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including but not limited, the following:

Money Judgment

A sum of money equal to at least approximately \$500 million in United States currency.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United

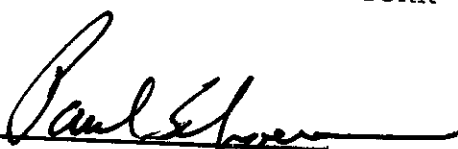
States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Section 853)

A TRUE BILL (

FOREPERSON

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

No. _____

UNITED STATES DISTRICT COURT

EASTERN

District of NEW YORK

THE UNITED STATES OF AMERICA

vs.

MAXIMILIANO BONILLA OROZCO,
also known as "Valenciano,"

Defendant.

INDICTMENT

Cr. No. _____
T.21, U.S.C.; §§ 959(c), 960(a)(3), 960(b)(1)(B)(i),
and 963; T.18, U.S.C., §§ 3551 et seq.)

A true bill.

Foreman

Filed in open court this 4th
of May A.D. 192008 day.

Clerk

Bail, \$ _____

BONNIE KLAPPER, AUSA (718) 254-6426

NEW YORK FEDERAL COURT

INFORMATION SHEET - TO BE FILED UNDER SEAL

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

★ MAR 04 2008 ★

BROOKLYN OFFICE

1. Title of Case: United States v. Maxiliano Bonilla Orozco
2. Related Magistrate Docket Number(s) N/A
3. Arrest Date: N/A
4. Nature of offense(s): (xx) Felony
() Misdemeanor
5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules):
United States v. Eugenio Jaramillo Garcia, et al, 07 CR 646(JS)
6. Projected Length of Trial: Less than 6 weeks (x)
More than 6 weeks ()
7. County in which the cause of action arose: Queens
(Pusuant to Rule 50.1(d) of the Local EDNY Division of Business Rules)
8. Has this indictment/information been ordered sealed?
(X) Yes () No
9. Have arrest warrants been ordered?
(X) Yes () No

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

By: 

Bonnie S. Klapper
Assistant U.S. Attorney
(718) 254-6426